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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

PAUL SANTIAGO,

Petitioner,

vs.

CALVIN JOHNSON, *et al.*,

Respondents.

Case No.: 2:21-cv-00896-APG-NJK

**UNOPPOSED MOTION FOR
ENLARGEMENT OF TIME TO FILE
RESPONSE TO SECOND AMENDED
PETITION (ECF NO. 27)**

(FIRST REQUEST)

Respondents move this Court for an enlargement of time of 63 days¹ from the current due date of September 12, 2022, up to and including November 14, 2022, in which to file their response to Paul Santiago's Second Amended Petition for a Writ of Habeas Corpus Pursuant to 28 U.S.C. § 2254 (ECF No. 27). This Motion is made pursuant to FED. R. CIV. P. 6(b) and Rule 6-1 of the Local Rules of Practice and is based upon the attached declaration of counsel. This is the first enlargement of time sought by Respondents to file the response, and the request is brought in good faith and not for the purpose of delay.

DATED: September 9, 2022.

AARON D. FORD
Attorney General

By: /s/ Trisha Chapman
Trisha Chapman (Bar No. 12716)
Deputy Attorney General

¹ Petitioner's Counsel agreed to a 60-day continuance but after calculating the deadline it fell on November 11, 2022, which is a federal holiday, so the deadline was moved to the following business day.

DECLARATION OF TRISHA CHAPMAN

STATE OF NEVADA)
) ss:
COUNTY OF CLARK)

I, TRISHA CHAPMAN, being first duly sworn under oath, deposes and states as follows:

1. I am an attorney licensed to practice law in all courts within the State of Nevada and am employed as a Deputy Attorney General in the Office of the Nevada Attorney General. I have been assigned to represent Respondents in *Paul Santiago v. Calvin Johnson, et al.*, Case No. 2:21-cv-00896-APG-NJK, and as such, have personal knowledge of the matters contained herein.

2. This Motion is made in good faith and not for the purpose of delay.

3. The deadline to file a response to Santiago's Petition is September 12, 2022.

4. I have been unable with due diligence to timely complete the response herein. Our office is now in receipt of the state court record, which still needs to be sorted through and redacted pursuant to LR IC 6-1, which will require additional time because this matter involves a minor sex assault victim.

5. Since receiving Santiago's Petition, I filed responses in the following federal cases: *Johnson v. William Hutchings*, 2:21-cv-00707-APG-EJY (motion to dismiss); *Thompson v. Jerry Howell*, 2:21-cv-00511-GMN-NJK (substantive answer) and *Sampson v. Perry Russell*, 3:20-cv-00615-MMD-CSD (reply in support of motion to dismiss and non-opposition to request for leave to file corrected second amended petition). I have also been working on a substantive answer in *McCallister v. Brian Williams, et al.*, 2:18-cv-01140-JCM-EJY.

6. In addition, I filed responsive pleadings in the Eighth Judicial District Court in the following state habeas cases: A-22-849987-C, A-22-853191-W, A-22-856120-W, A-22-856145-W, A-22-856146-W, A-22-856221-W and A-22-855532-W. I also filed a state response in the Seventh Judicial District Court in case HC-2206002, a state response in the First Judicial District Court in case 22 EW 00029 1B and a response in the Nevada Supreme Court in Case No. 84513.

7. Taking into consideration the time I need to index and redact the state record as well as complete the response and have it reviewed via our internal office policies, I believe 60 days will be sufficient to complete the response to Santiago's Petition.


8. I have communicated with counsel for Santiago, and he has no objection to this request.

1 9. For the foregoing reasons, I respectfully request an enlargement of time of 63 days, up to
2 and including November 14, 2022, in which to file a response to Santiago's Petition.

3 Executed on September 9, 2022.

4 /s/ Trisha Chapman
5 Trisha Chapman (Bar No. 12716)

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7 IT IS SO ORDERED:

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10 UNITED STATES DISTRICT JUDGE

11 Dated: September 12, 2022
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